## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 18-04177-CV-C-NKL

FOURTEEN MISCELLANEOUS FIREARMS,

MISCELLANEOUS ROUNDS OF AMMUNITION,

Defendants.

## JOINT RESPONSE TO MOTION TO STAY FILED DECEMBER 10, 2018

On December 10, 2018, claimant Robert Bacon moved the court to stay this civil forfeiture action until the conclusion of a related criminal investigation on the ground that continuation of these civil proceedings would burden claimant Bacon's right against self-incrimination in the related criminal matter. Thereafter, the Court ordered the parties to set deadlines as to the requested stay.

The United States has no objection to a continuance in this civil forfeiture action. The parties proposes a 120-day stay of these proceedings. Once the stay is lifted, claimant Robert Bacon will file his answer within fourteen days.

WHEREFORE, the parties requests that the Court continue the stay in this civil forfeiture action to April 18, 2019, with an Answer due 14 days thereafter.

Respectfully submitted,

Timothy A. Garrison United States Attorney

By

/s/ Stacey Perkins Rock

Stacey Perkins Rock, #66141 Assistant United States Attorney Charles Evans Whittaker Courthouse 400 E. 9th Street, Fifth Floor Kansas City, Missouri 64106 Telephone: (816) 426-7173 Attorney for the United States

## /s/ Scott Hamblin

Scott Hamblin, Attorney for Claimant Robert Bacon Brydon Swearengin & England P.C. 312 E. Capitol Avenue P.O. Box 456 Jefferson City, Missouri 65102 Attorney for Claimant Robert Bacon